## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 7

TEAM SYSTEMS INTERNATIONAL, LLC,

Case No. 22-10066 (CTG)

Debtor.

Re: D.I. 310 & 312

## NOTICE OF DEPOSITION OF GEORGE L. MILLER IN HIS CAPACITY AS CHAPTER 7 TRUSTEE

PLEASE TAKE NOTICE that, pursuant to Fed. R. Bankr. P. 7030 and Fed. R. Civ. P. 30(b)(1), Deborah Evans Mott, Steven M. Acosta, Christopher Mott, John S. Maciorowski (collectively, the "TSI Members"), by and through their undersigned counsel, will take the deposition upon oral examination of George L. Miller, in his capacity as chapter 7 trustee (the "Trustee") in the above-captioned case of Team Systems International, LLC in connection with:

- The Motion for Entry of Orders: (A) Staying Prosecution of First Amended Complaint or, Alternatively, Extending Time to Answer, Move or Otherwise Respond; (B) Capping Recovery, If Any, Under First Amended Complaint; (C) Granting Relief from the Automatic Stay to Permit TSI Members to Fund Appeal to Eleventh Circuit, (D) Compelling the Trustee to Abandon the \$8.2 Million Receivable; (E) Compelling Trustee to Abandon Debtor's Business; and (F) Granting Related Relief [Bankr. D.I. 310];
- The Trustee's *Preliminary Objection of the Chapter 7 Trustee to (I) the Delay Motion and (II) Movants' Discovery Requests* [Bankr. D.I. 312] (the "Obj.") [D.I. 312]; and
- any *Reply* filed to the Objection.

The deposition will begin at 10:00 a.m. on June 12, 2023, and continue thereafter, from day-to-day, until concluded, or at such other time as may be agreed to by counsel for the parties or as ordered by the Court, at The Rosner Law Group LLC, 824 N. Market Street, Suite 810, Wilmington, Delaware. The deposition will be taken before a notary public or other

officer authorized by law to administer oaths, and will be recorded by sound, video, and/or stenographic means.

Dated: May 23, 2023

Wilmington, Delaware

## THE ROSNER LAW GROUP LLC

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Counsel to TSI Members

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